

HONORABLE JUDGE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JENNIFER P. SCHWEICKERT,

Plaintiff,

v.

HUNTS POINT VENTURES, INC; HUNTS
POINT VENTURE GROUP, LLC; CHAD
RUDKIN and ELIZABETH RUDKIN, and
their marital community comprised thereof;
JOHN DU WORS and AMBER DU WORS,
and their marital community comprised
thereof; and DOES 1-4;

Defendants.

Case Number: 2:13-cv-00675-RSM

**DECLARATION OF REED YURCHAK
IN OPPOSITION TO DEFENDANT DU
WORS' MOTION FOR SUMMARY
JUDGEMENT**

**NOTED FOR HEARING:
NOVEMBER 7, 2014**

I, REED YURCHAK, hereby declare as follows:

I am an attorney duly licensed to practice before this honorable court and am one of the attorneys of record for plaintiff Jennifer Schweickert in the above-entitled matter and have personal knowledge of the following facts and if called as a witness would competently testify hereto.

- 1 1. Attached hereto as Exhibit “A” for the court’s convenience is a true and correct copy
2 of the declaration of Stephen James Schweickert, without the attached Exhibits.
- 3 2. Attached hereto as Exhibit “B” for the court’s convenience is a true and correct copy
4 of the declaration of Doug Lower, without the attached Exhibits.
- 5 3. Attached hereto as Exhibit “C” is a true and correct copy of the deposition of Jennifer
6 Schweickert, volumes 1 and 2.
- 7 4. Attached hereto as Exhibit “D” is a true and correct copy of the deposition of John Du
8 Wors, from both the instant case (two volumes), and from Phillips v. Du Wors, et al.
9 (one volume). I attach the full depositions for the court’s convenience, but have cited
10 to specific pages in the depositions herein.
- 11 5. Attached hereto as Exhibit “E” is a true and correct copy of the excerpts from the
12 deposition of Elizabeth Rudkin.
- 13 6. Attached hereto as Exhibit “F” is a true and correct copy of the excerpts from the
14 deposition of Chad Rudkin.
- 15 7. Attached hereto as Exhibit “G” is a true and correct copy of Defendant Du Wors’
16 Responses to Interrogatories.
- 17 8. Attached hereto as Exhibit “H” is a true and correct copy of Defendant Du Wors’
18 Response to Notice to Produce, with a copy of the “IP Sales Agreement” referred to
19 herein.
- 20 9. Attached hereto as Exhibit “I” is a true and correct copy of the Notice of Shareholder
21 Meeting sent to Plaintiff and referred to herein.
- 22 10. Attached hereto as Exhibit “J” are true and correct copies of the “Notes for HPV”
23 prepared by Elizabeth Rudkin.
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1 11. Attached hereto as Exhibit “K” are true and correct copies of the billing records from
2 Newman & Du Wors referred to herein.

3 12. Attached hereto as Exhibit “L” are true and correct copy of a memo by Michael Spain
4 of Newman & Du Wors.
5

6 I declare under penalty of perjury under the laws of the United States that the foregoing is
7 true and correct to the best of my knowledge.
8

9 Executed this 3rd day of November, 2014, at Bellevue, Washington.
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11 By: /s/ Reed Yurchak
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